

**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

IN RE SUN HEALTHCARE
GROUP, INC. V. THCI
COMPANY LLC

MDL DOCKET NO. _____

**MOTION OF THCI COMPANY LLC TO TRANSFER AND
CONSOLIDATE ACTIONS FOR PRETRIAL PROCEEDINGS**

Pursuant to 28 U.S.C. § 1407, THCI Company LLC (“THCI”) hereby moves this Panel for an Order consolidating for pretrial proceedings, in the United States District Court for the District of New Jersey, four actions instituted by Sun Healthcare Group, Inc. (“Sun”), and Sun’s subsidiaries and affiliates, against THCI and its subsidiaries. The actions are pending in three different district courts, and involve common issues of fact and law, and they arise from the same transactions and occurrences.

The grounds supporting THCI’s motion are set forth in the accompanying memorandum.

Respectfully Submitted,



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Schedule I**BEFORE THE JUDICIAL PANEL
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Pursuant to Rule 7.2(a)(ii) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, THCI Company LLC provides the following information on the actions that will be affected by this Motion:

<u>Complete Case Name</u>	<u>District Where Pending</u>	<u>Civil Action No.</u>	<u>Judge Assigned (if known)</u>
<i>Sun Healthcare Group, Inc. v. THCI Company, LLC</i>	New Jersey	04-cv-01202-HAA-GDH	Judge Harold A. Ackerman
<i>Mediplex of Connecticut, Inc. v. 745 Highland Avenue Operating Co., LLC</i>	Connecticut	04-00754 (CFD)	Judge Christopher F. Droney
<i>Mediplex of Massachusetts, Inc. v. Park, Marion and Vernon Streets Op. Co., LLC</i>	Massachusetts	04-10903 (RCL)	Judge Reginald C. Lindsay
<i>Mediplex Rehabilitation of Massachusetts, Inc. v. 910 Saratoga and 16-20 Trident Streets, LLC</i>	Massachusetts	04-10904 (PBS)	Judge Patti Saris